

**FEDERAL REGISTER Document Number: 2020-27001**

**Summary:** NHTSA is issuing this ANPRM to seek public comment on whether any test procedures for any Federal Motor Vehicle Safety Standards (FMVSS) may be a candidate for replacement, repeal, or modification, for reasons other than for considerations relevant only to automated driving systems (ADS). This document is a continuation of the Agency's efforts to improve the FMVSS and minimize burdens. The Agency takes this action in response to its review of the FMVSS and to public comments solicited by DOT in a 2017 notice on its regulatory reform efforts. The commenters requested that NHTSA amend test procedures for air brakes and occupant crash protection. NHTSA has also identified some possible additional test procedure issues and discusses them in this Notice. In addition, this ANPRM also seeks comments and supporting information relating to any other test procedures which may be a candidate for replacement, repeal or modification, not just those specifically discussed in this Notice.

**Agency:** National Highway Traffic Safety Administration

**Parent Agency:** Department Of Transportation

**Date Published:** December 10, 2020

**Docket Number:** NHTSA-2020-0109

**Action:**

Advance notice of proposed rulemaking (ANPRM):  
Request for Comments with 30 Day Extension

**Action Reply:**

Comments

**Date Submitted:** March 12, 2021

**Comments Submitted By:**

David DeVeau

DEVCO Design & Development

Westfield, MA 01085

**Attachments:** (File Name)

NHTSA-FMVSS\_NCAP-Alliance\_David-DeVeau.pdf

Alliance for Automotive Innovation  
1050 K St NW #650  
Washington, DC 20001

Subject: NHTSA-2020-0109 Proposed Rule: FMVSS Test Procedures

To Whom It May Concern:

It is very understandable why the Alliance would need an extension to comment on the vast depth of Federal Motor Vehicle Safety Standards that need to be updated or newly written to address all of today and tomorrow's road vehicle safety features.

There is a much more effective way for the industry and all stakeholders than having to address each standard in a Petition for Decision of Inconsequential Noncompliance and wait through public comments on each one and is in accordance with the Paperwork Reduction Act.

The use of the NCAP Rating System and Label Requirements for this consumer information tool with clear definition of the NHTSA authority for safety testing conditions and measurements is the fastest way to safely move our road safety forward for all stakeholders.

Reference: NHTSA-2020-0106-0021 NCAP Rating and Labeling

Thank you in advance for your time to review this reference material and for comments on the fastest way to move our road vehicle safety forward.

Best safety regards to us all,  
David DeVeau  
DEVCO Design & Development